



The Commonwealth of Massachusetts

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

FIRST SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO CAMBRIDGE ELECTRIC LIGHT COMPANY AND COMMONWEALTH ELECTRIC COMPANY d/b/a NSTAR ELECTRIC DTE 03-118/04-114

Pursuant to 220 C.M.R. § 1.06 (6)(c), the Department of Telecommunications and Energy ("Department") submits to Cambridge Electric Light Company ("Cambridge") and Commonwealth Electric Company ("Commonwealth") d/b/a NSTAR Electric (collectively, "the Companies") its First Set of Information Requests in the matter docketed as 04-114.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Companies in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of requests, a reference to request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Companies or their witnesses receive or generate additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work papers.

5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notation or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve copies of the responses as follows: (a) one (1) copy to Mary L. Cottrell, Secretary of the Department and to all parties; (b) one (1) copy to Shaela McNulty Collins, Hearing Officer; (c) two (2) copies with Jeff Hall, Rates and Revenue Requirements Division; and (d) two (2) copies with Meera Bhalotra, Rates and Revenue Requirements Division. All written documents (except those for which confidential treatment is sought) should also be submitted to the Department in electronic format using one of the following methods: (1) by e-mail attachment to dte.efiling@state.ma.us and to Shaela.Collins@state.ma.us; or (2) on a 3.5" disk, IBM-compatible format. The text of the e-mail or the disk label must specify: (1) the docket number of the proceeding (D.T.E. 03-118/D.T.E. 04-114), (2) name of the person or company submitting the filing, and (3) a brief descriptive title of the document (e.g., Response to Information Requests). The electronic filing should also include the name, title and phone number of a person to contact in the event of questions about the filing. Text responses should be created in either Corel WordPerfect, Microsoft Word, or as an Adobe-compatible PDF file. Data or spreadsheet responses should be compatible with Microsoft Excel. Documents submitted in electronic format will be posted on the Department’s Website, <http://www.mass.gov/dte>.

Requests

- DTE 1-1 Please provide electronic copies of all exhibits in Microsoft Excel format with formulas in cells.
- DTE 1-2 Refer to Exhibits CAM-CLV-1 (Supp) at 1, and COM-CLV-1 (Supp) at 1. For each exhibit, please explain the derivation of the transition charge located in column C for 2005 (.288 cents per kilowatthour for Cambridge, and 2.660 cents per kilowatthour for Commonwealth). In addition, provide complete and detailed documentation of the derivation of the transition charge, including underlying data in Microsoft Excel format with formulas in cells.

- DTE 1-3 Please refer to Exhibits CAM/COM-CLV at 16-17 and CAM-CLV-2 (Supp).
- (a) Provide complete and detailed documentation, including invoices, and an itemization of the total 2003 Legal Costs - Market Issues and total 2004 Legal Costs - Market Issues found in CAM-CLV-2 (Supp) at 2.
 - (b) Explain why these costs are allocated by load for the Companies.
 - (c) Explain how each of these costs qualify as transition costs.
 - (d) Cite to the location in the Company's restructuring plan where the ability to collect such items in the transition charge is allowed.
 - (e) To the extent that any of these items appeared before the Department or the Federal Energy Regulatory Commission ("FERC"), provide the docket number.
- DTE 1-4 Please refer to Exhibits CAM/COM-CLV at 16-17 and COM-CLV-2 (Supp).
- (a) Provide complete and detailed documentation, including invoices, and an itemization of the Payments in Lieu of Property Taxes items found in COM-CLV-2 (Supp) at 2.
 - (b) Explain why these costs are allocated by load for the Companies.
 - (c) Explain how each of these costs qualify as transition costs.
 - (d) Cite to the location in the Company's restructuring plan where the ability to collect such items in the transition charge is allowed.
 - (e) To the extent that any of these items appeared before the Department or FERC, provide the docket number.
- DTE 1-5 Please refer to Exhibits CAM/COM-CLV at 16-17 and COM-CLV-2 (Supp).
- (a) Provide complete and detailed documentation, including invoices, and an itemization of the NEIL Insurance Credit Refund items and Maxey Flats LLC Expenses items found in COM-CLV-2 (Supp) at 3.
 - (b) Explain why these costs are allocated by load for the Companies.

- (c) Explain how each of these costs qualify as transition costs.
- (d) Cite to the location in the Company's restructuring plan where the ability to collect such items in the transition charge is allowed.
- (e) To the extent that any of these items appeared before the Department or FERC, provide the docket number.

DTE 1-6 Please refer to Exhibits CAM/COM-CLV at 16-17 and COM-CLV-2 (Supp).

- (a) Provide complete and detailed documentation, including invoices, and an itemization of the DOE/SNF Litigation Expense items found in COM-CLV-2 (Supp) at 4.
- (b) Explain why these costs are allocated by load for the Companies.
- (c) Explain how each of these costs qualify as transition costs.
- (d) Cite to the location in the Company's restructuring plan where the ability to collect such items in the transition charge is allowed.
- (e) To the extent that any of these items appeared before the Department or FERC, provide the docket number.

DTE 1-7 Please refer to Exhibits CAM/COM-CLV at 16-17 and COM-CLV-2 (Supp).

- (a) Provide complete and detailed documentation, including invoices, and an itemization of the total 2003 Legal Costs - Market Issues and total 2004 Legal Costs - Market Issues items found in COM-CLV-2 (Supp) at 5.
- (b) Explain why these costs are allocated by load for the Companies.
- (c) Explain how each of these costs qualify as transition costs.
- (d) Cite to the location in the Company's restructuring plan where the ability to collect such items in the transition charge is allowed.
- (e) To the extent that any of these items appeared before the Department or FERC, provide the docket number.

- DTE 1-8 Refer to Exhibits CAM/COM-CLV (Supp) at 3, CAM-CLV-3, CAM-CLV-3 (Supp), COM-CLV-3 and COM-CLV-3 (Supp). Please explain why updates to page 2 of these exhibits do not change any values on page 1 of these exhibits, specifically the value found on line 16.
- DTE 1-9 Please refer to Exhibit CAM-CLV-4 (Supp) at 2. Provide a table with the following information regarding each contract: (1) list of contracts on the exhibit, as well as any contracts of which the company had ownership beyond those listed; (2) plant's location; (3) plant's in-service date; (4) plant's energy source; (5) size of unit; (6) Company ownership share; (7) Company entitlement; (8) renegotiated or bought-out; (9) counter-party; (10) net proceeds to the Company; (11) savings to ratepayers; and (12) closing or termination date.
- DTE 1-10 Please refer Exhibit COM-CLV-4 (Supp) at 2. Please provide a table with the following information regarding each contract: (1) list of contracts on the exhibit, as well as any contracts of which the company had ownership beyond those listed; (2) plant's location; (3) plant's in-service date; (4) plant's energy source; (5) size of unit; (6) Company ownership share; (7) Company entitlement; (8) renegotiated or bought-out; (9) counter-party; (10) net proceeds to the Company; (11) savings to ratepayers; and (12) closing or termination date.
- DTE 1-11 Refer to Exhibits CAM/COM-HCL at 6, CAM-HCL-6 (Replacement), and COM-HCL-6. Please explain the derivation of the transition adjustment charges for each rate class. In addition, provide complete and detailed documentation of the derivation of the transition adjustment charges for each rate class, including underlying data in Microsoft Excel format with formulas in cells.
- DTE 1-12 Refer to Exhibits CAM-HCL-2, CAM-HCL-6 (Replacement), and CAM-CLV-1 (Supp) at 1, and COM-HCL-2, COM-HCL-6, and COM-CLV-1 (Supp) at 1. Please explain the difference between Cambridge's and Commonwealth's 2005 KWH forecasts used by each of the witnesses, including why different forecasts were used in different analyses.
- DTE 1-13 Now that standard offer service has expired, what do the Companies plan to do both physically and financially with their remaining load obligation?

DTE 1-14 Do the Companies have ownership entitlement in any generation units? If yes, please provide a table with the following information: (1) list of units; (2) unit's location; (3) unit's in-service date; (4) unit's energy source; (5) size of unit; (6) each company's ownership share; (7) each company's entitlement; (8) renegotiated or bought-out; (9) counter-party; (10) net proceeds to each company; (11) savings to ratepayers; and (12) closing or termination date.